

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN BOYD et al.,

Plaintiffs,

v.

AWB LIMITED and AWB (U.S.A.)
LIMITED,

Defendants.

Case No. 07-cv-3007

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

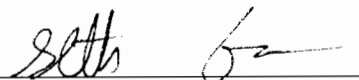
Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Seth R. Gassman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Benjamin D. Brown
Cohen, Milstein, Hausfeld & Toll, PLLC
West Tower, Suite 500
1100 New York Avenue, NW
Washington, DC 20005
Tel: 202-408-4600
Fax: 202-408-4699
bbrown@cmht.com

Benjamin D. Brown is a member in good standing of the Bar of the State of California and the District of Columbia, and there are no pending disciplinary proceedings against him in any State or Federal court.

Dated: July 11, 2007

Respectfully submitted,


Seth R. Gassman (SG-8116)
Cohen, Milstein, Hausfeld & Toll, PLLC
150 East 52nd Street
Thirtieth Floor
New York, NY 10022
Tel: 212-838-7797
Fax: 212-838-7745

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JOHN BOYD et al.,

Plaintiffs,

V.

AWB LIMITED and AWB (U.S.A.)
LIMITED,

Defendants.

Case No. 07-cv-3007

**AFFIDAVIT OF SETH R.
GASSMAN IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)

SS:


County of New York)

Seth R. Gassman, being duly sworn, hereby deposes and says as follows:

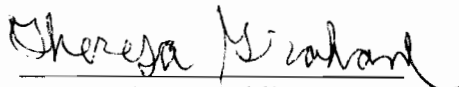
1. I am an associate at Cohen, Milstein, Hausfeld & Toll, PLLC, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Benjamin D. Brown as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in April 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Benjamin D. Brown since March 2007.
4. Mr. Brown is a partner at Cohen, Milstein, Hausfeld & Toll, PLLC, in Washington, DC.
5. I have found Mr. Brown to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am please to move the admission of Benjamin D. Brown, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Benjamin D. Brown, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Benjamin D. Brown, pro hac vice, to represent Plaintiffs in the above captioned matter be granted.


Seth R. Gassman (SG-8116)

Sworn to before me this
11th day of July, 2007


Notary Public

TERESA A. GRAHAM
Notary Public, State of New York
No. 01GR5054854
Qualified in Bronx County
Commission Expires Jan. 29, 20__

**UNITED STATES DISTRICT COURT
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LIMITED,

Defendants.

Case No. 07-cv-3007

**[PROPOSED] ORDER FOR
ADMISSION PRO HAC VICE**

Upon the motion of Seth R. Gassman, counsel for Plaintiffs in the above captioned case,
and said sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that

Benjamin D. Brown
Cohen, Milstein, Hausfeld & Toll, PLLC
West Tower, Suite 500
1100 New York Avenue, NW
Washington, DC 20005
Tel: 202-408-4600
Fax: 202-408-4699
bbrown@cmht.com

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the clerk of the Court.

Dated: _____, 2007

Gerard E. Lynch
United States District Judge



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

June 22, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BENJAMIN DOYLE BROWN, #202545 was admitted to the practice of law in this state by the Supreme Court of California on September 29, 1999; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Kath Lambert

Custodian of Membership Records



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

BENJAMIN D. BROWN

was on the 9th day of January, 2006

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on June
18, 2007.

GARLAND PINKSTON, JR., CLERK

By: *Rachel Corbin*
Deputy Clerk

CERTIFICATE OF SERVICE

I, SETH R. GASSMAN, certify that I served a true and correct copy of the foregoing Motion to Admit Counsel Pro Hac Vice by First Class Mail on this 11th day of July, 2007 upon the following counsel of record:

L. Palmer Foret, Esq.
THE LAW FIRM OF L. PALMER FORET, PC
1735 20th Street, NW
Washington, DC 20009
Telephone (202) 332-2404
Telecopy (202) 332-2808

Michael P. Lehmann, Esq.
FURTH, LEHMANN & GRANT, LLP
225 Bush Street, 15th Floor
San Francisco, CA 94104
Telephone (415) 433-2070
Telecopy (415) 982-2076

Bruce L. Simon, Esq.
Gary S. Soter, Esq.
PEARSON, SIMON, WARSHAW, PENNY, LLP
44 Montgomery Street, Suite 1200
San Francisco, CA 94104
Telephone (415) 433-9000
Telecopy (415) 433-9008

Roberta D. Liebenberg, Esq.
Donald L. Perelman, Esq.
FINE, KAPLAN & BLACK, RPC
1835 Market Street, 28th Floor
Philadelphia, Pennsylvania 19103
Telephone (215) 567-6565
Telecopy (215) 568-5872

*Counsel for Plaintiffs John Boyd, Veryl Switzer,
Gillan Alexander, Rod Bradshaw, Wilburt Howard
and Pat Dailey.*

Gerald J. Rodos, Esq.
Mark R. Rosen, Esq.
Jeffrey B. Gittleman, Esq.
Chad A. Carder, Esq.
BARRACK, RODOS & BACINE
3300 Two Commerce Square
2001 Market Street
Philadelphia, PA 19103
Telephone (215) 963-0600
Telecopy (215) 963-0838

A. Arnold Gershon, Esq.
Gloria Kui, Esq.
BARRACK, RODOS & BACINE
1350 Broadway, Suite 1001
New York, NY 10018
Telephone (212) 688-0782

Anthony J. Bolognese, Esq.
Joshua H. Grabar, Esq.
BOLOGNESE & ASSOCIATES, LLC
One Penn Center
1617 JFK Boulevard, Suite 650
Philadelphia, PA 19103
Telephone: (215) 814-6750

Counsel for Plaintiff Melvin Erb

Steven A. Asher, Esq.
Mindee J. Reuben, Esq.
WEINSTEIN KITCHENOFF & ASHER LLC
1845 Walnut Street
Suite 1100
Philadelphia, PA 19103
Telephone (215) 545-7200
Telecopy (215) 545-6535

W. Joseph Bruckner
Richard A. Lockridge
Lisa M. Pollard
LOCKRIDGE GRINDAL NAUEN PLLP
Suite 2200
100 Washington Avenue South

Minneapolis, MN 55401
Telephone (612) 339-6900
Telecopy (612) 339-0981

Joseph C. Kohn
KOHN, SWIFT & GRAF, PC
One South Broad Street
Suite 2100
Philadelphia, PA 19107
Telephone (215) 238-1700
Telecopy (215) 238-1968

Thomas S. McNamara
INDIK & MCNAMARA, PC
100 South Broad Street
Suite 2300
Philadelphia, PA 19110
Telephone (215) 567-7125
Telecopy (215) 563-8330
Counsel for Plaintiff Dennis Brothers

Robert H. Baron, Esq.
Timothy G. Cameron, Esq.
Members of the Firm
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
Telephone (212) 474-1000

*Counsel for Defendants AWB Limited and AWB
(U.S.A.) Limited*



Seth R. Gassman